

February 24, 2025

Shawn Woodward #01298508
Atlantic County Justice Center
5060 Atlantic Avenue
Mays Landing, NJ 08330

Clerk of the Court
District of New Jersey (Camden)
4th & Cooper Street - Room 1050
Camden, NJ 08101

RECEIVED

FEB 28 2025

AT 8:30 _____ M
CLERK, U.S. DISTRICT COURT - DNJ

RE: 42 USC § 1983 Civil Rights Complaint

Dear Clerk,

Enclosed for filing is the above person
42 USC § 1983 civil rights complaint.

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FEB 28 2025

Shawn Woodward
Pro Se

United States District Court
District Court of New Jersey (Camden)

RECEIVED

FEB 28 2025

Shawn A. Woodward
Plaintiff

AT 8:30 M
CLERK, U.S. DISTRICT COURT - DNJ

Plaintiff
Shawn
Woodward's
Civil Rights
Law Suit

v.

Owees of The Lenox Building Lo-
cated at 3 South Iowa Avenue in At-
lantic City, NJ 08401; Nicholas Hall
and Atlantic City Detective Jane
Doe of the Atlantic City Police Depart-
ment, all sued in their individual and
official capacity,

Pursuant To
42 USC §§
1983, 1988
1985, 1986
Docket
Numbers:

defendants

This Court has jurisdiction over this lawsuit
pursuant to 28 USC §§ 1343(3) and (4) and 1331
and 42 USC §§ 1983, 1988, 1985, 1986

A) Parties To This Action:

1.) Plaintiff: Shawn A. Woodward #01298508
Address : Atlantic County Justice Center

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mother Kristy Manero ("Ms. Manero") get her food items ordered from Wal-Mart. While Woodward was waiting in the elevator he was hit in the face with a baseball bat by Hall. Woodward ran out of the elevator to defend himself and subsequently ended up outside in the back alleyway of the BRGMB.

7.) Once Woodward was in the alleyway he was stabbed in the left thigh by Hall.

8.) Subsequently, Woodward was treated for his injury and Hall was arrested on the spot.

9.) While Woodward was in the hospital he was interviewed by Defendant Detective Jane Doe of the Atlantic City Police Department ("Dt. J. D."). Dt. J. D. informed Woodward that Hall was arrested and did he has anything to say. Woodward who was in pain declined a statement.

10.) Defendant BRGMB knew that there were people living in 3 South Iowa that did not be-

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and tell her that Sandy Bebe's lease was up which infact Sandy Bebe had three (3) months left on the lease. This was done so BRGMB could rent the apartment out to another person and moreso Woodward will provide evidence from Ms. Manero that the BRGMB would pay her to "bully", "threaten" and "lie" to other tenants regarding the rent, the constant broken elevator, the unclean hallways, etc)

13.) Ms. Manero said that she would call the BRGMB and speak to them about Hall and his mother.

14.) On December 3rd, 2023 Ms. Manero told Woodward that she spoke to someone with the BRGMB and to "Nick" (NOTE: Nick was the building allegedly Maintenance Man who lived on the 2nd floor; Nick was hospitalized at least once for an overdose while on the property of 3 South Iowa and during his work duties; Nick was a well-known drug user and moon-lighting drug dealer). While (on the phone with

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Sometime got from "Nick" and Hall threaten to "Kill" Woodward.

17.) During the late December of 2023/early January of 2024 Woodward went to the ACPD to speak with Defendant Dt. J.D. Before Dt. J.D. had to hear what Woodward had to say she became unnecessarily hostile towards Woodward for ~~(bothering her)~~ bothering her.

18.) Woodward then asked to speak to a supervisor which he was denied.

19.) Woodward went to Ms. Manero's house and was informed that he could not see his "daughter" Truly Manero. Ms. Manero stated that Defendant Dt. J.D. informed her that Woodward was a "sex offender" on "Megan's Law" "Should not be around Truly Manero" and that if she - Dt. J.D. - found out that Ms. Manero let Woodward around her kids - Ms. Manero let Woodward around Truly and/or Legacy Manero - she would call DFYS and lock

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Email "From" and "To" the BRGMB)

23.) Additionally, Ms. Manero explained (by Email) that her "health" and "weight" was an issue.

c.) Relief:

24.) Woodward request that the District Court of New Jersey enter a judgment against Defendants BRGMB, Hall and Dr. JD, jointly, in the amount of \$1,000,000.00 which will be considered compensatory and punitive damages.

D.) Constitutional Basis:

25.) Defendant BRGMB violated Woodward's rights to freedom of speech by revealing to Hall's mother and "Nick" that it was Ms. Manero and Woodward who complained about the drug use in the building and Hall illegally living in the building. Which caused Hall to physically assault Woodward. BRGMB also violated Woodward's right to be free from cruel and unusual punishment.

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